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BY ORDER OF THE COURT

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United States Attorney
District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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NOV 17 2022
at 2 o'clock and 13 min M *aw*
John A. Mannle, Clerk

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA

Plaintiff,

vs.

KELIIKOA ("KELI") KAIMANA (01)
FOSTER YOUNG,
AUSTIN WAIWAILOLE, (02)
ROCKY DUQUE, (03)
TRAVIS DIAS, (04)
KANIELA PEREZ, and (05)
JASON FREDERICO, (06)

Defendants.

) CR. NO. **CR22-00106 JAO**

)

) **FILED UNDER SEAL**

)

) **INDICTMENT**

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) [21 U.S.C. §§ 846, 841(a)(1), and
) 841(b)(1)(A)-(B); 18 U.S.C. §
) 1951]

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The Grand Jury charges:

Count 1

Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine
(21 U.S.C. § 846)

From a precise date unknown, but at least by September 28, 2020, and continuing to on or about July 22, 2021, both dates being approximate and inclusive, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, AUSTIN WAIWAIIOLE, ROCKY DUQUE, TRAVIS DIAS, and KANIELA PEREZ, the defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to distribute and possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

Count 2

Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about September 28, 2020, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, the defendant, did knowingly distribute

5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Count 3
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about October 8, 2020, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, the defendant, did knowingly distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 4
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about November 10, 2020, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG and AUSTIN WAIWAIIOLE, the defendants, did knowingly distribute 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Count 5
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about March 15, 2021, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, ROCKY DUQUE, and TRAVIS DIAS, the defendants, did knowingly distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 6
Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about April 15, 2021, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, the defendant, did knowingly distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 7

Distribution of Methamphetamine
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about June 15, 2021, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG and KANIELA PEREZ, the defendants, did knowingly distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 8

Conspiracy to Interfere with Commerce by Robbery
(18 U.S.C. § 1951(a))

From a precise date unknown, but at least by June 29, 2021, and continuing to on or about July 1, 2021, both dates being approximate and inclusive, within the District of Hawaii, KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG and JASON FREDERICO, the defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1).

All in violation of Title 18, United States Code, Section 1951(a).

Forfeiture Notice

1. The allegations set forth in Counts 1 through 7 of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853.

2. The United States hereby gives notice that, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1) or 846, as charged in Counts 1 through 7 of this Indictment, KELIIKOA (“KELI”) KAIMANA FOSTER YOUNG, ROCKY DUQUE, TRAVIS DIAS, and KANIELA PEREZ, the defendants, shall forfeit to the United States of America any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. As to KELIIKOA (“KELI”) KAIMANA FOSTER YOUNG, the defendant, the property to be forfeited includes but is not limited to:

- a. a silver Ford F-250 bearing Hawaii registration RGN351;
- b. a 2016 white Mercedes Benz sedan bearing Hawaii registration SFS888 and VIN 55SWF4JB1GU144960; and
- c. approximately \$24,100.00 in United States currency.

4. As to ROCKY DUQUE, the defendant, the property to be forfeited includes but is not limited to a 2018 gray Toyota Tacoma bearing Hawaii registration TND995 and VIN 3TMCZ5ANXJM134605.

5. As to TRAVIS DIAS, the defendant, the property to be forfeited includes but is not limited to approximately \$6,500.00 in United States currency.

6. As to KANIELA PEREZ, the defendant, the property to be forfeited includes but is not limited to approximately \$15,000.00 in United States currency.

7. If by any act or omission of KELIIKOA (“KELII”) KAIMANA FOSTER YOUNG, ROCKY DUQUE, TRAVIS DIAS, and KANIELA PEREZ, the defendants, any of the property subject to forfeiture described in paragraphs 3 through 6 of this section:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property up

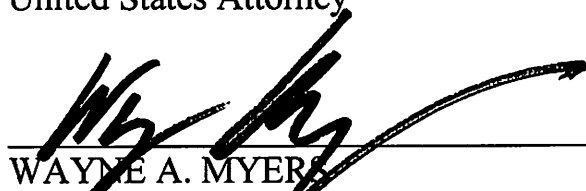
to the value of the property described above in paragraphs 2 through 7 of this section,
pursuant to Title 21, United States Code, Section 853(p).

DATED: November 17, 2022, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson

FOREPERSON, GRAND JURY


CLARE E. CONNORS
United States Attorney
WAYNE A. MYERS
W. KEAUPUNI AKINA
Assistant U.S. Attorneys

United States v. Keliikoa ("Keli") Kaimana Foster Young, et al.
Indictment

Cr. No. **CR 22 - 00106 JAO**